

STATE OF SOUTH CAROLINA)	
)	IN THE COURT OF COMMON PLEAS
COUNTY OF RICHLAND)	FIFTH JUDICIAL CIRCUIT
Junnie Mae Wider,)	Civil Action No. 2005-CP-40-1019
)	
Plaintiff,)	
)	
vs.)	<u>ISUZU MOTORS AMERICA, INC.'S</u>
)	<u>FIRST INTERROGATORIES</u>
Isuzu, Inc. and Kathy Williams,)	<u>TO PLAINTIFF</u>
)	
Defendants.)	
)	

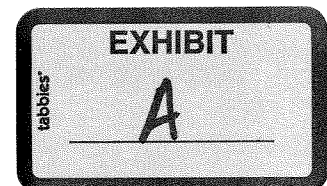
NOW COMES ISUZU MOTORS, INC., improperly identified in the Complaint as "Isuzu, Inc.," and serves these interrogatories upon the plaintiff, as an opposite party, and requests that they be answered fully in writing and under oath within 30 days from the date of service thereof, all in accordance with Rule 33 of the South Carolina of Civil Procedure. Each interrogatory is addressed to the personal knowledge of the plaintiff, as well as to the knowledge and information of plaintiff's attorneys, investigators, agents, employees, and other representatives. When a question is directed to the plaintiff, the question is also directed to the aforementioned persons.

These interrogatories shall be deemed continuing so as to require supplemental answers if the persons to whom these interrogatories are addressed obtain further information between the time the answers are served and the time of trial.

DEFINITIONS

As used herein, the terms listed below are defined as follows:

1. "Document" means every writing or record of every type and description that is or has been in your possession, control, or custody or of which you have knowledge, including



but not limited to, correspondence, memoranda, tapes, stenographic or handwritten notes, studies, publications, books, pamphlets, pictures, drawings and photographs, films, microfilms, voice recordings, maps, reports, surveys, minutes, or statistical computations.

2. "Person" means any natural person, corporation, partnership, proprietorship, association, organization, or group of persons.

3. "Plaintiff" refers to Junnie Mae Wider.

4. "Complaint" refers to plaintiff's Complaint in the above-styled action.

5. "Vehicle" refers to the 2003 Isuzu Ascender referenced in plaintiff's Complaint.

6. "Incident" refers to the accident giving rise to this lawsuit alleged to have occurred on August 5, 2004.

7. (a) "Identify" with respect to any "person" or any reference to stating the "identity" of any "person" means to provide the name, home address, telephone number, business name, business address, business telephone number, and a description of each person's connection with the events in question.

(b) "Identify" with respect to any "document" or any reference to stating the "identification" of any "document" means to provide the title and date of each document, the name and address of the party or parties responsible for the preparation of each document, the name and address of the party who requested or required the preparation or on whose behalf it was prepared, the name and address of the recipient or recipients of each document, the present location of any and all copies of each document, and the names and addresses of any and all persons who have custody or control of each document or copies thereof.

INTERROGATORIES

1.

Please state the full name of plaintiff, all prior names, social security number, date and place of birth, occupations, current home and business addresses, and all residential addresses (including the dates at each address) and employers (including the dates with each employer) for the five-year period immediately preceding the subject incident.

2.

Please state plaintiff's height, weight, and body size (chest, waist, inseam, and hip measurements) immediately preceding the subject incident and state the source or authority for these measurements and the date on which they were taken.

3.

Please provide the make, model, and vehicle identification number of the subject vehicle, and state the odometer reading at the time of the incident which forms the basis of this lawsuit, and identify all owners of the subject vehicle from the date it was first sold as new, indicating the periods of ownership for each and odometer reading at the time of acquisition.

4.

Please identify any and all persons or places of business that serviced, repaired, or modified the subject vehicle either before or after the incident which forms the basis of this lawsuit, and include the date and nature of each such service, repair, or modification.

5.

Please identify each person who inspected the subject vehicle or any part or parts thereof prior to or subsequent to the incident which forms the basis of this lawsuit and identify anyone who removed any parts from the subject vehicle, explain exactly which components were

removed and how they were removed, and provide the chain of custody from date of removal until present (listing the periods each custodian had the removed parts in his/her possession).

6.

If the subject vehicle has been involved in any accident or has been damaged in any way, other than the incident which forms the basis of this lawsuit, describe each accident and each item of damage, and identify all persons having knowledge of said accidents and damages.

7.

Please state the present location of the subject vehicle and identify all custodians of the subject vehicle and each and every part thereof since the occurrence, and state for each the time periods during which he or she had custody of said vehicle or part and where the vehicle or part was located.

8.

If plaintiff was involved in any accident, other than the incident which forms the basis of this lawsuit, describe each accident, any injuries to her and each item of damage to any vehicle involved, and identify the dates of any such accidents, the parties involved, and the resolution of any claims arising therefrom.

9.

If plaintiff contends that any part or parts of the subject vehicle were defectively manufactured, please provide the following information: name or type of part, the alleged defect or defects in said part, the identity of each expert upon whose opinion the contention of defect is based, and all evidence (documents or otherwise) in support of the defect claim.

10.

If plaintiff contends that any part or parts of the subject vehicle were defectively designed, please provide the following information: name or type of part, the alleged defect or defects in said part, the identity of each expert upon whose opinion the contention of defect is based, and all evidence (documents or otherwise) in support of the defect claim.

11.

Please describe the incident which forms the basis of this lawsuit, state the origin and destination of the trip, state where plaintiff was seated in the subject vehicle at the time of the incident, state whether she was wearing her seat belt, identify any other passengers in the subject vehicle, state whether any other vehicles were involved in the subject incident, and identify all passengers in such other vehicles.

12.

Please identify each person who has information regarding any facts and circumstances relevant to the subject incident.

13.

Please identify any investigation reports, photographs (moving or still), and written or otherwise recorded statements dealing in any regard with the subject vehicle, the incident which forms the basis of this lawsuit, the subsequent investigation of said incident, or any of the facts or circumstances upon which plaintiff's allegations are based. For each written or recorded statement, please list the person taking the statement, the date of the statement, and all persons having a copy of said statements.

14.

Please identify all fact witnesses plaintiff intends to call at the trial of this matter. With respect to each such witness, please provide the substance of each such witness' testimony and identify those witnesses plaintiff, plaintiff's counsel, or her representatives have contacted in connection with this litigation.

15.

Please identify any experts, mechanics, or other persons plaintiff contends are experts whom plaintiff expects to call as expert witnesses to testify regarding their experience, investigation, examination, or knowledge concerning the subject incident or vehicle in general, or anything related to plaintiff's contention in connection with this litigation, and please provide the subject matter on which such expert is expected to testify, the substance of the facts and opinions to which such expert is expected to testify, and a summary of the grounds for each such opinion to which such expert is expected to testify. With respect to each witness who is expected to provide expert testimony on plaintiff's behalf, please identify the following: all materials furnished to the purported expert, list every lawsuit in which the witness has testified at trial in the preceding four years (providing the caption or style of the case, the case number and court in which the case is pending, the party on whose behalf the witness testified, and the attorney for each party), and list every lawsuit in which the proposed expert has testified by way of deposition in the preceding four years (providing the caption or style of the case, the case number and court in which the case is pending, the party on whose behalf the purported expert testified, and the attorney for each party).

16.

Please identify each physician, osteopath, chiropractor, or other practitioner of any of the healing arts, who examined or treated plaintiff in connection with the subject incident.

17.

Please state whether plaintiff is obligated, whether by lien, subrogation, or other means, to pay any entity some or all of the proceeds plaintiff may receive in this lawsuit.

18.

Please identify all persons or companies whom plaintiff contends are obligated under contracts of insurance or otherwise to pay any benefits with respect to any loss or damage resulting from the subject incident.

19.

If plaintiff has received any type of payment from any source in connection with or arising from the subject incident (including any settlement agreements or releases), please identify from whom the payments have been received, state the amount of each such payment, and identify any documents executed in connection with each such payment.

20.

Please list the full style, action number, court, and court term of any lawsuits or other claims filed, other than the present action, concerning the subject incident.

21.

Please state the nature and extent of any physical or mental disability, impairment, or handicap of any kind plaintiff possessed at the time of the subject incident.

22.

Please state whether plaintiff consumed any alcoholic beverages or any controlled substances (e.g. marijuana, cocaine, heroin, etc.) in the 24-hour period immediately preceding the subject incident. If the answer is affirmative, please identify the place where the alcoholic beverage(s) and/or controlled substances were purchased, and any person(s) present while such beverages and/or controlled substances were being consumed or otherwise inhaled or injected, and the amount of alcohol and/or controlled substances consumed.

23.

Please identify and describe the injuries sustained by plaintiff as a result of the subject incident.

24.

Please itemize any special damages plaintiff claims as a result of the subject incident.

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*Attorneys for Defendant
Isuzu Motors America, Inc.*

Charleston, South Carolina
December 27, 2005

CERTIFICATE OF SERVICE

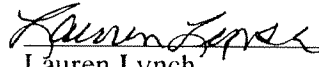
I, the undersigned, of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Isuzu Motors America, Inc., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing first class postage pre-paid to the following address(es):

Pleadings:

ISUZU MOTORS AMERICA, INC.'S
FIRST INTERROGATORIES TO PLAINTIFF

Counsel Served:

William Gary White, III, Esq.
2009 Lincoln Street
Columbia, SC 29201


Lauren Lynch

December 27, 2005